DECC/Ofgem Stakeholder Workshop:
Issue Log for the Requirements for Generators Network Code

Last Updated: 25 June 2015

Prior to the final Requirements for Generators (RfG) European Cross Border Committee meeting on 25-26 June 2015, DECC and Ofgem requested final stakeholder comments on the RfG network code based on the version dated 10 June 2015 which was circulated by the Joint European Standing Group (JESG) on 11 June 2015. This document summarises the issues captured in written comments before the stakeholder workshop on 16 June and any additional comments raised at the meeting.

This is a summary of the key issues raised by GB stakeholders and is not a detailed issue log capturing all the details submitted or discussed on the day.

This document will be published on the Joint European Stakeholder Group (JESG) website.

Issue Priority (as indicated by stakeholders)	Description of your priority RFG comments	Impact and evidence
High	The Article 2(7) definition (of 'main generating plant') could allow a power generating facility owner to buy existing generator status by contracting to buy relatively low value items of equipment, contradicting the clear intent of articles 3(1) and 4. E.g. A nuclear developer could purchase an alternator only or a wind farm developer could purchase only one out of many planned wind turbines. The text should be amended to say "'main generating plant' means all of the principal items of equipment required to convert the primary source of energy into electricity"	The existing text could allow many planned generators to evade the scope of RfG to the detriment of the aims of RfG as set out in the recitals
High	Article 7(2) - the requirement for regulatory authority approval should be extended to technical requirements for offshore power park modules i.e. Articles 25(1) and 25(5) should be added to those listed in 7(2)(e) to ensure equity of treatment of onshore and offshore generation	
High	Articles 7(6), 7(7) and 7(8) - the timescales are too long and could be a significant risk to projects which need certainty when designing early "new" generating facilities	
High	Article 10 describes the requirements for relevant system operator and TSO public consultations on a number of matters. Other bodies are required to conduct consultations but the manner in which these should be done is not described. The consultation principles described in article 10 should be extended to these other consultation i.e. Articles 58(2), 61(1) and 63(10).	

High	Recital 9 – the first use of “installation” has been replaced with “facility”. This is confusing as “installation” is used throughout the rest of the article and “facility” has very different connotations.	Important to have absolute clarity about what comprises the set of equipment that the banding requirements appertain to. The use of the word “facility” implies aggregating ALL the capacity at a site where this is synchronous, whereas what is intended is not to aggregate all, but to define the banding as applying to what is operated as a single entity. Suggest revert to the original wording.
High	Table 7, Table 8 and Table 11 - the **GB** value for “Maximum range of steady-state voltage level in PU” must be increased from ~~0.100~~ to 0.225.	The existing “Maximum range of steady-state voltage level in PU” values set out in Tables 7, 8 and 11 do not provide us with sufficient voltage control capability and are considerably less than our current requirements. If we do not have sufficient capability at least in line with our current requirements then we know we face a real risk to our system voltage stability. These values therefore must be increased from 0.100 to 0.225 for GB, which would also harmonise them with Continental Europe’s values. This change only affects GB.
High	Recital 28 - We find this recital confusing and not consistent with Regulation (EC) No 714/2009. According to Article 7(1)- quoted in this recital, “any person likely to have an interest in that network code” can propose amendments, whereas this new recital refers solely to ENTSO-E and ACER.	In our view- there is no added value in that recital and therefore it should be deleted. However, in case it is maintained it should be amended (see our proposal below in green) to be fully consistent with the letter of Regulation (EC) No 714/2009. “Where the European Network of Transmission System Operators for Electricity ("ENTSO for Electricity"), the Agency for the of Energy Regulators ("the Agency") or any other person likely to have an interest in that network code, establish that, based on market developments or experience gathered in the application of this Regulation, further

		harmonisation is advisable to promote market integration, they shall propose draft amendments to this Regulation pursuant to Article 7(1) of Regulation (EC) No 714/2009".
Medium	Article 39 - The development of the electricity system can lead to changing requirements to conventional power generation modules, e.g. type C and D. However, although, they are in most cases not the originator of the changing requirements, they would have to bear the costs of retrofitting and modernization which might be in contradiction with the user pays-principle. It is crucial that this principle applies and that the real originator, as well as the benefitting parties, bear the costs for the application of rules on existing plants. Otherwise, competition would be unfairly distorted.	
Medium	Art 13.8 – this new clause introduces new exemptions for which there is no justification given and which seems to be a distortion of the market. As drafted it will allow unchecked growth of this technology, never having to conform to the excepted obligations, irrespective of aggregate capacity.	This new exemption is a market distortion cf other technologies in this size range.
	Article 13(8) - I support this new paragraph but why restrict its application to wind only? Baxi's Ecogen stirling engine micro CHP product might also benefit from a similar exemption.	The drafting actually says that if, in 2014, the 2014 penetration of this technology is> 0.1% then the exemption shall be revoked. But the 2014 penetration never changes irrespective of what the current penetration is.
Low	Article 15(6)(a) - poor grammar. "protect the power generating module from damage" or "prevent the power generating module from being damaged"	
Low	Art 32.6 – I am not certain that this is realistic. An authorised certifier can provide assurance on some of the items (as per Art 32.2.(d)) – but I am not sure that an authorised certifier will be able to deal with all the content of PGMD.	
High	Art. 7 - We are slightly confused about the new drafting of Article 7 (regulatory approvals)- with 2 new paragraphs. Paragraph 2 lists the requirements which must be approved by the NRA. Paragraph 3 specifies that for the remaining parameters the NRAs may approve them if they want to. This is also not consistent with our previous position, i.e. that everything must be approved by the NRAs to ensure a proper checks and balances.	
Medium	Art 38(3) - As you know in the previous version of the Code, there was a possibility for the power generating facility owner to undertake a qualitative CBA in response to a quantitative CBA carried out by the relevant TSO. We found it to be a very positive development. In our opinion, with the new drafting of Article 38, this possibility was removed. However this was not the intention. In order to avoid that this confusion persist, it might be beneficial to change the wording back to the one used in the previous version that everybody felt comfortable with.	

Medium	Art 11 - Need for an appropriate geographical representation of stakeholders - rejected by the Commission with an annotation that this should be addressed in the Terms of Reference (ToR) of the respective stakeholder committees.	
	Emerging technologies category: We are pleased to see further clarification on derogation for third parties on behalf of a power generating module owner. With regard to the category for emerging technologies we have some concerns. This is due to the addition of a technology specific derogation for micro-wind – see below - which refers to wind technology that are not classified as emerging technologies under Title VI. This infers that some wind technologies may be classified as emerging technologies. I don't think this was ever the intention and we are concerned that this may impact the ability of Stirling engine mCHP to be included in this capacity limited category. Some clarification/reassurance would be helpful It is also surprising to see at this stage a specific reference to a technology. We previously pushed for a technology specific clause and drafted various versions of text that included this but were always told that this was not possible and that the text must not be technology specific.	